

REMARKS

The examiner states that various claims are “provisionally” rejected under the doctrine of double patenting. The Applicant will address any concerns of the Examiner as these claims are identified as allowable.

The drawings and specification are held objected based on various informalities. The Applicant has obtained the services of a professional patent draftsman, and due to delays on the part of the draftsman, such drawings are not yet available. Formal drawings which address the Examiner’s concerns will soon be provided. Nevertheless, the Applicant respectfully asserts that the drawings are clear enough to proceed with examination, and so the Examiner is respectfully requested to proceed with the examination, or either to make the appropriate corrections via Examiner’s amendment. Should the Examiner require a formal amendment, the Examiner is requested to call the Attorney for the Applicant and said formal amendments will be provided.

Claim Rejections

Claims 1-20 comprise independent claims 1, 10, 12.

Claim 1) An intelligent docking station (IDS) system that includes a docking station having a co-processor capable of converting a hand held-based data element into a device enabled data element, a bus that couples the docking station to a handheld computer, where the handheld computer having a processor operated by a first operating system, where the co-processor being operated by a second operating system, the second operating system communicating with a top-level driver capable of formatting handheld-based data element into a device enabled data element, and also enabled to deliver the device enabled data element to a low level device driver; and which also includes a device coupled to the docking station, the device capable of receiving the device enabled data element from the low level driver;

Claim 10) A software system for an intelligent docking station that includes an IDS operating system, a communication driver, the communication driver capable of sending and receiving bus-enabled data elements, a low-level device driver, the low-level device driver capable of sending and receiving device-based data elements, a top-level device driver, the top-level device driver capable of assembling and formatting data elements for a low-level device driver, whereby the IDS operating system adapted to communicate with a first operating system for a handheld computer having a processor; and whereby the IDS operating system being adapted to execute via a co-processor communicating with the top-level driver, and also enabled to deliver a device enabled data element to the low-level device driver; and

Claim 12) A software system for enabling a handheld computer to use an intelligent docking station that includes an IDS operating system, a low-level device driver in communication with the IDS operating system, a top-level device driver in communication with the IDS operating system, a communication driver in communication with the top level device driver, the communication driver capable of converting signals between a bus-enabled data element and a handheld data element, whereby the IDS operating system adapted to communicate with a first operating system for a handheld computer having a processor; and whereby the IDS operating system being adapted to execute via a co-processor communicating with the top-level driver, and also enabled to deliver a device enabled data element to the low-level device driver.

Rejections Under 35 USC §102

Claims 1-18 stand rejected under 35 USC §102 in view of *Huber, et al. (Huber)*. The Applicant respectfully traverses the rejection under 35 USC §102. First, the Examiner's reliance on extrinsic evidence (outside *Huber*' four corners) necessarily takes the examination out of 35 USC 102, which requires that the single reference alone must teach the Applicant's invention. Second, *Huber* is unqualified as a reference under 35 USC §102 because *Huber* is not enabling as an intelligent docking station. Third, the Examiner failed to properly define the scope and meaning of each claim limitation. Rather, the Examiner mischaracterizes the *Huber* reference, and misuses of the *Huber* reference. Thus, *Huber* does not teach the invention as arranged as in the claims and should be withdrawn as a reference under 35 USC §102.

I. Requirement for Examiner to Rely on Single Reference

Claims 1-18 stand rejected under 35 USC §102 in view of *Huber*. By implication, it is being asserted that *Huber* teaches, within its four corners, each and every element of, *in the detail and the manner of*, the claims of the invention. On the law of anticipation, Judge Learned Hand stated:

No doctrine of the patent law is better established than that a prior patent or other publication to be an anticipation must bear within its four corners adequate directions for the practice of the patent invalidated. *Dewey & Almy Chem. Co. v. Mimex Co.*, 124 F.2d 986, 989 (2d Cir. 1942).

Accordingly, the Examiner may rely on only a single reference, and the single reference must show each and every element as set forth ("arranged") in the claim. *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 730 F.2d 1452 (Fed. Cir. 1984). The Examiner's reliance on evidence outside the four corners of a single reference (explained in more detail below) indicates that the examiner should withdraw the rejections based on *Huber*, and such

withdrawal is requested.

II. Requirement of Enablement to Qualify as a Reference

Further, the reference relied upon must be enabling. In *Paperless Accounting, Inc. v. Bay Area Rapid Transit Systems*, 804 F.2d 659, 665 (Fed Cir. 1986): “[A] §102(b) reference must sufficiently describe the claimed invention to have placed the public in possession of it . . . [E]ven if the claimed invention is disclosed in a printed publication, that disclosure will not suffice as prior art if it was not enabling . . .” See also, *Akzo N.V. v. U.S.I.T.C.*, 808 F.2d 1471, 1479 (Fed. Cir. 1986) (“the prior art reference must be enabling. . .”). The reference must be enabling with respect to the claimed invention (as opposed to the underlying device or method taught in the reference). If the reference is inoperative with respect to the claimed invention, then the reference does not teach the invention and is not prior art. In *re Shepard*, 172 F.2d 560 (C.C.P.A. 1949). *Huber* teaches a Handheld computer integrated with a personal computer (PC) [see *Huber's* abstract, Figure 6, paragraphs 13 “. . . that **includes a PC,**” 14 “. . . **interface to the PC,**” 15 “. . . **PC chassis,**” 25 “. . . **dual PC system,**” 26 “. . . **PC chassis,**” 27 “. . . the **PC chassis,**” 30 “. . . **to the PC chassis,**” 31 “. . . **PC architecture,**” 33 “. . . **dual PC system,**” 34 “. . . **PC chassis,**” 35 “. . . **PC chassis,**” 36 “. . . **PC system,**” 37 “. . . **PC system.**” Thus, *nearly every* paragraph describing the invention of *Huber* describes a PC as being integral with the invention! EVERY claim of *Huber* incorporates a PC. *Huber* would clearly fall apart without a PC. *Huber* does not teach an intelligent docking station which itself negates the need for a personal computer.

This is tantamount to an admission that *Huber* cannot be used apart from a PC. A non-enabling reference must not even be considered as a reference. In *re Wilder*, 429 F.2d 447 (C.C.P.A. 1964). Accordingly, the Examiner is respectfully requested to withdraw the rejection to the Applicant's invention under 35 USC §102 in view of *Huber*.

III. Lack of Prima Face Showing

The Examiner has failed to enter evidence and facts sufficient to establish a prima face case of anticipation. To establish a Prima Facie basis for anticipation, the Examiner bears the burden to show the factual basis of the anticipation rejection. *In re Warner*, 379 F.2d 1011, 389 U.S. 1057 (1968). Such basis must be both factually sufficient, and reasonable.

In addition, to establish a prima face case of anticipation, the Examiner further bears the burden to first show a correct interpretation, including the scope and meaning, of each contested limitation. *Gechter v. Davidson*, 116 F.3d 1454 (Fed. Cir. 1997). This is required, in part, so that the Applicant can ascertain whether or not the Examiner understands the invention, and so that the Applicant can frame a response. 37 CFR 1.106(b). Of course, the interpretation must rely on teachings found within the four corners of the reference. *Dewey & Almy Chem. Co. v. Mimex Co.*, 124 F.2d 986, 989 (2d Cir. 1942).

1. The Examiner Failed to define the scope and meaning of each limitation

The Examiner copies the claims into the Office Action in an effort to identify the claim elements. However, the Examiner does not define the “scope and limitation” of each of these elements. Accordingly, the definitions of the elements are limited to the definitions expressly taught by *Huber*.

MPEP § 2131 states that a claim is anticipated if and only if each and every element as set forth in the claim is found either expressly or inherently described in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987). “The identical invention must be shown in as complete detail as in the . . . claim.” *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989). The Examiner **must** interpret meaning of words in light of the specification. *Gechter v. Davidson*, 116 F.3d 1454 (Fed. Cir. 1997). Nowhere in the Office Action does the Examiner identify the source of the following limitations in *Huber*:

- A. a second operating system
- B. a top-level driver
 - 1. capable of formatting handheld-based data element into a device enabled data element, and also
 - 2. enabled to deliver the device enabled data element to a low level device driver.

These heretofore-unknown elements, for which the Examiner cannot locate a single reference, are merely dismissed as “inherent.” The low-level/high-level device driver dichotomy is an element of each and every claim, and the absence of a reference that identifies these elements, much less some aspect of their operation, compels the Applicant to request that the rejections to the claims based on *Huber* under 35 USC 102 be withdrawn.

2. Inherency not Permissible; Mischaracterizations and Impermissible Modifications of *Huber*

Under MPEP § 2131, a claim is anticipated if and only if each and every element as set forth in the claim is found either expressly or inherently described in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987). “The identical invention must be shown in as complete detail as in the claim.” *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989). To rely on “inherency,” the reference must be silent as to that element. *Continental Can Co. U.S.A. v. Monsanto Co.*, 948 F.2d 1264 (Fed. Cir. 1993) at 1268-1269. The Examiner must interpret meaning of word in light of the specification. *Gechter v. Davidson*, 116 F.3d 1454 (Fed. Cir. 1997).

Contrary to the Examiner’s representation that all elements are disclosed in the *Huber* reference, *Huber* does not teach all of the elements of each of the independent claims. In fact, ***Huber* does not teach even one of the following elements** (which are chosen simply as examples): (A) a docking station, (B) a co-processor capable of converting hand held based data elements, (C) a second operating system, (D) a top-level driver, or (E) a low-level driver.

A. Huber Does Not Teach a Docking Station

The Examiner states that *Huber* teaches a docking station. However, *Huber* is not teaching or even suggesting “the identical invention in as complete detail as in the ____ claim.” It is clear from *Huber* description that element 600 is not a docking station but a PC chassis (paragraph 00036). *Huber* never even uses the words “docking station.” Nor does *Huber* ever show a docking station. Rather, the Examiner’s reasoning is more akin to an inkblot test. The law requires more. Clearly the Examiner is modifying and manipulating the *Huber* reference to allege anticipation, which is unacceptable, and itself shows that *Huber* does not teach, show or suggest the “identical invention ____ in as complete detail as in the ____ claim.” .. Accordingly, the Applicant respectfully traverses this mischaracterization of *Huber*’s PC chassis, and urges the Examiner to withdraw the rejection under 35 USC §102.

B. Huber Does not Teach, Show or Suggest a co-processor capable of converting hand held based data elements

Huber does not teach, show or suggest a co-processor capable of converting hand held based data elements. What the Examiner styles “a co-processor” 475 is, in fact, defined by *Huber* as a video controller portion of a co-processor 405. This mischaracterization is understandable since *Huber* explicitly states that the co-processor 405 is an application specific ASIC, and would thus not be “capable of converting hand held based data elements.” Such mischaracterizations are impermissibly overreaching, and could serve as a textbook example of unreasonably broad, strained interpretations, reached only in hindsight. In fact, such amazing mental leaps demonstrate on their face that the ASIC of *Huber* is not the “co-processor capable of converting hand held based data elements” claimed by the Applicant. Accordingly, the Applicant and urges the Examiner to withdraw the rejection under 35 USC §102.

C. Huber Does Not Teach a second operating system

Huber does not teach, show or suggest a second operating system communicating with a top level driver capable of formatting a handheld-based data element into a device enabled data element. The Examiner cites paragraphs 6 and 8 for the proposition that *Huber* teaches using a first and second operating system. However, even a cursory reading of these paragraphs (much less the entire application of *Huber*) makes it abundantly clear that *Huber* is referring to a PC operating system running on a PC, and a completely separate PDA operating system running on a PDA--each operating system functioning merely to sync files between two devices. No reformatting of data takes place in such a system--no suggestion is made in the application that either operating system "formats a handheld-based data element into a device enabled data element." Accordingly, the Applicant and urges the Examiner to withdraw the rejection under 35 USC §102.

D & E. Huber Does Not Teach a low-level device driver or a top-level device driver

Huber does not teach, show or suggest a top-level or low-level device driver, *anywhere*. The Examiner cannot site a single reference incorporating such language because these concepts are entirely new. Thus, the Examiner makes the remarkable assertion that such driver operations are inherent. Accordingly, the Applicant traverses the rejection, and urges the Examiner to withdraw the rejection under 35 USC §102 based on *Huber*. As stated above, to rely on inherency, the reference must be silent as to that element. *Continental Can Co. U.S.A. v. Monsanto Co.*, 948 F.2d 1264 (Fed. Cir. 1993) at 1268-1269. However, the Examiner must interpret meaning of word in light of the specification. *Gechter v. Davidson*, 116 F.3d 1454 (Fed. Cir. 1997). Nothing in *Huber* suggests a low level or high level device driver, and thus the rejection to the claims based on 35 USC 102 should be withdrawn.

Accordingly, *Huber* cannot be said to teach "the identical invention . . . in as complete detail as in the ____ claim" and the rejection to the claims under *Huber* should be withdrawn.

Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236 (Fed. Cir. 1989).

3. Misuse of the *Huber* Reference

The Examiner repeatedly reads elements of *Huber* broader than any reasonable and legally permissible reading of the reference allows, necessarily relies on extrinsic readings to do so, and then manipulates elements of *Huber* to allegedly anticipate the Applicant's invention. While broad readings and manipulations are permissible as "obviousness" rejections under 35 USC §103, manipulations and incorporation of definitions and material outside the scope of the cited references is impermissible under 35 USC §102. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989). Using extrinsic matter and other references is not permissible for an anticipation rejection. *Continental Can Co. USA v. Monsanto Co.*, 948 F.2d 1264 (Fed. Cir. 1991). Accordingly, the use of *Huber* as a reference under 35 USC §102 is impermissible, and all rejections based on *Huber* under 35 USC §102 should be withdrawn.

Reliance on Common Knowledge or Common Sense is Not Permitted

Often, the Examiner seems to attempt to make connections and draw conclusions using largely hindsight reasoning, based on what the Examiner deems to be common knowledge or common sense. Recently, Judge Newman, in her opinion in *In re Lee*, 277 F.3d 1338, 1343, 61 USPQ2d 1430 (Fed Cir. 2002), repeated a fundamental principle that an examiner cannot simply rely upon "common knowledge" or "common sense":

The "common knowledge and common sense" on which the Board relied in rejecting Lee's application are not the specialized knowledge and expertise contemplated ...The Board's findings must extend to all material facts and must be **documented on the record**, lest the "haze of so-called expertise" acquire insulation from accountability. **"Common knowledge and common sense"**,

even if assumed to derive from the agency's expertise, do not substitute for authority when the law requires authority. *Id.*

Where no reasonable intrinsic or extrinsic justification exists for the proposed modification or reading, *prima facie* obviousness will not have been established. To the extent that the Examiner is relying on extrinsic definitions, this is impermissible as well. *Continental Can Co. USA v. Monsanto Co.*, 948 F.2d 1264 (Fed. Cir. 1991). Accordingly, where no reasonable justification for a proposed finding of obviousness exists, much less can it be said to form the basis of a rejection under anticipation which requires the “identical invention in as complete detail as in the claim” to be shown. Accordingly, the rejections of claims 1, and 11 and those that depend therefrom under 35 USC §102 in view of the *Huber* reference, should be withdrawn and the withdrawal of the same is respectfully requested.

IV. Summary, Conclusion and Prayer for Relief

In summary, the Examiner finds limitations such as low level device driver, high level device driver, co-processor, docking station, and second operating system from a reference in which not even a single one of these words appears. Then the Examiner states that the Applicant's invention can be gleaned by arranging the unfound elements in an untaught manner to get the client's invention, when *Huber* does not even allege itself to be operable independent of a PC. Thus, the Examiner makes errors in both identification of structural elements in *Huber*, misuses *Huber*, errs in the characterization of *Huber*, ignores relevant structural limitations in the Applicant's claims, and relies heavily on “common knowledge” and extrinsic evidence beyond *Huber*'s “four corners.” Further, by failing to identify the scope and meaning of each element at issue and the scope and meaning of each relevant element of the reference, the Examiner has, albeit unintentionally, created a moving target impenetrable to any targeted argument. Thus, such failings result in a legally insufficient basis to establish a *prima facie* case of anticipation. *Gechter v. Davidson*, 116 F.3d 1454 (Fed. Cir. 1997). If the examination at the initial stage does not produce a prima face case of unpatentability, then without more the applicant is entitled to a

grant of the patent. *In re Oetiker*, 977 F.2d 1443 (Fed. Cir. 1992). Accordingly, the Examiner is respectfully requested to withdraw all rejections based on *Huber* under 35 USC §102.

Rejections Under 35 USC §103

The Examiner rejects claims 19, and 20 under 35 USC 103 as being obvious under *Huber*. *Huber* is addressed in great detail above, and is shown to be of questionable applicability, and such arguments are hereby incorporated to the traverse of the rejections under 35 USC 103. For the following reasons, it will be shown that the rejections under 35 USC 103 under *Huber* do not raise a prima face case of obviousness, are improperly applied, and should be withdrawn.

There Must Be a Basis in the Art for Modifying Reference

MPEP§ 2143.01 provides:

The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. *In re Mills*, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990).

The Federal Circuit has several times expressly addressed the issue of how to evaluate an alleged case of prima facie to determine whether it has been properly made. Thus, *In re Geiger*, *supra*, stated, in holding that the PTO “failed to establish a *prima facie* case of obviousness”:

Obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching, suggestion or incentive supporting the combination. *ACS Hospital Systems, Inc. v. Monteffore Hospital*, 732 F.2d 1572, 221 USPQ 929,933 (Fed. Cir. 1984).

Of course, application of §103 presumes the existence of differences between the subject matter claimed and the teachings of any particular prior art reference. Otherwise, a rejection under §102 would have sufficed. Thus, the Examiner must propose some modification of a particular reference or a combination thereof with another reference in order to arrive at the claimed invention. The Federal Circuit's assessment in *Geiger*, quoted above, is directed to the sufficiency of the teachings of a particular reference to justify a conclusion that any proposed modification or combination of references is what one of ordinary skill in the art would have found obvious to do at the time the invention was made.

Recently, Judge Newman in her opinion in *In re Lee*, 277 F3d. 1338, 1343, 61 USPQ2d 1430, (Fed Cir. 2002) repeats this fundamental principle:

When patentability turns on the question of obviousness, the search for and analysis of the prior art includes evidence relevant to the finding of whether there is a teaching, motivation, or suggestion to select and combine the references relied on as evidence of obviousness.

Judge Newman went on to advise the PTO that it cannot meet that test by simply saying that the basis for combining references comes from "common knowledge" or is "common sense", viz:

The "common knowledge and common sense" on which the Board relied in rejecting Lee's application are not the specialized knowledge and expertise contemplated by the Administrative Procedure Act...The Board's findings must extend to all material facts and must be documented on the record, lest the "haze of so-called expertise" acquire insulation from accountability. "Common knowledge and common sense", even if assumed to derive from the agency's expertise, do not substitute for authority when the law requires authority. *Id.*

The CCPA earlier expressly held that there must be some logical reason apparent from the evidence of record that would justify a combination or modification of references. *In re Regel*, 188USPQ 132 (CCPA 1975). In determining whether one of ordinary skill in the art would find it obvious to modify or combine references, the teachings of the reference taken with the knowledge that a worker in the art already possesses constitute the scope and content of the prior art that is referred to in the *Graham* decision. Thus, the question raised under § 103 is whether the prior art taken as a whole would suggest the claimed invention taken as a whole to one of ordinary skill in the art. Accordingly, even if all elements of a claim are disclosed in various prior art references, the claimed invention taken as a whole cannot be said to be obvious without some reason given in the prior art why one of ordinary skill would have been prompted to combine the teachings of the references to arrive at the claimed invention. *In re Regel, supra*.

Prima facie obviousness does exist when the prior art suggests or anticipates the benefits of modifying or combining references or when external factors, such as the changing state of the art, provide the motivation to one of ordinary skill in the art to make the modification or combination. However, where no reasonable intrinsic or extrinsic justification exists for the proposed combination or modification, *prima facie* obviousness will not have been established.

Thus, it is important for the practitioner to examine whether there is an intrinsic basis in the prior art or some extrinsic factor that would prompt one of ordinary skill in the art to combine the teachings of the references. If there is not then the Examiner has not met the burden of establishing a *prima facie* case of obviousness, and it becomes a task of the practitioner to traverse the rejection by way of denying the existence of a *prima facie* case of obviousness.

The Federal Circuit has also repeatedly warned against using the applicant's disclosure as a blueprint to reconstruct the claimed invention out of isolated teachings in the prior art. *See, e.g., Grain Processing Corp. v. American Maize-Products*, 840 F2d. 902, 907, 5 USPQ2d 1788, 1792 (Fed. Cir. 1988).

The black letter law statements by Judge Linn in *In re Kotzab*, 217 F.3d 1365, 55 USPQ2d 1313 (Fed. Cir. 2000) address this subject, viz:

a) Hindsight Syndrome

A critical step in analyzing the patentability of claims pursuant to section 103(a) is casting the mind back to the time of invention, to consider the thinking of one of ordinary skill in the art, guided only by the prior art references and the then-accepted wisdom in the field. . . . Close adherence to this methodology is especially important in cases where the very ease with which the invention can be understood may prompt one “to fall victim to the insidious effect taught is used against the teacher.” (*Id.* At 1369, 55 USPQ2d at 1316) (citations omitted).

b) Need for Motivation

Most if not all inventions arise from a combination of old elements. ... Thus, every element of a claimed invention may often be found in the prior art. *See id.* However, identification in the prior art of each individual part claimed is insufficient to defeat patentability of the whole claimed invention. *See id.* Rather, to establish obviousness based on a combination of the elements disclosed in the prior art, there must be some motivation, suggestion or teaching of the desirability of making the specific combination that was made by the applicant. (*Id.* at 1369, 55 USPQ2d at 1316) (citations omitted).

(c) Particular Findings Required

The motivation, suggestion or teaching may come explicitly from statements in the prior art, the knowledge of one of ordinary skill in the art, or, in some cases the nature of the problem to be solved. In addition, the teaching, motivation or suggestion may be implicit from the prior art as a whole, rather than expressly stated in the references. ... The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art. ... Whether the Board relies on an express or an implicit showing, it must provide particular findings related thereto. Broad conclusory statements standing alone are not “evidence.” (*Id.* at

1370, 55 USPQ2d 1317) (citations omitted). The Examiner does not provide a single motivation for modifying *Huber* to achieve the invention as defined in claims 19, or 20. There are no findings that would justify a motivation to modify *Huber* to achieve any of the teachings of invention, much less the teachings in claims 19 and 20. Nor does the examiner identify the source for a motivation to alter *Huber* to achieve the teachings of claims 19 and 20. Accordingly, withdrawal of the rejections to claims 19 and 20 based on *Huber* under 35 USC 103 is respectfully requested.

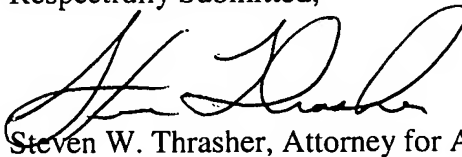
In the Event Arguments are Believed Insufficient

The Examiner is thanked for the phone interview, his consideration, and for acknowledging that there appears to be patentable subject matter in the present patent application even though he felt at the time of the interview that the unamended claims do not appear technically adequate. Should the Examiner disagree that the remarks place the application in condition for allowance, then the Examiner is respectfully requested to prepare an acceptable proposed set of claims pursuant to MPEP 707.07 (j).

Thus, it is believed that the pending claims are allowable, and allowance of said claims is respectfully requested. Other references made of record but not relied upon in the Office Action are considered no more relevant to the invention than the reference relied upon by the Examiner.

If the Examiner has other matters which remain, the Examiner is encouraged to contact the undersigned attorney to resolve these matters by Examiner's Amendment where possible.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "S. W. Thrasher", is written over the printed name.

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